

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**FIRST SET OF INFORMATION REQUESTS OF NSTAR GAS COMPANY TO THE
DIVISION OF PIPELINE ENGINEERING AND SAFETY**

D.T.E. 05-36

November 30, 2005

Persons Responsible: Christopher Bourne

Information Request NSTAR 1-36

Please identify each occasion since 1970 that the Division reviewed or inspected the operation and maintenance manuals of Commonwealth Gas Company and/or NSTAR Gas Company and provide a copy of all correspondence between the Division and the Company concerning the Division's reviews or inspections.

Response

The Division is not required to approve an operator's O&M manual. An operator is required to review and update its O&M manual "at intervals not exceeding 15 months, but at least once each calendar year." 49 C.F.R. § 192.605. Each operator is reviewed for compliance with each applicable section of Part 192 at least once every three years as part of the Division's comprehensive inspection pursuant to the Division of Pipeline Engineering and Safety Inspection Manual. Applicable sections of an operator's O&M manual are reviewed by Division engineers in conjunction with field inspections and incident investigations.

Division personnel conduct field audits or field inspections "periodically to review the work done by operator personnel to determine the effectiveness and adequacy of the procedures used in normal operation and maintenance." 49 C.F.R. § 605(b)(8). Therefore, any field inspections may address an operator's O&M plan. Attached are 49 C.F.R. § 605 field audit or inspection reports for NSTAR and Commonwealth Gas that specifically indicate a review of a section(s) of the operator's O&M manual because the field inspection addressed a procedure contained in the O&M manual. Due to the large number of inspection reports for NSTAR and Commonwealth Gas, only those specifically addressing § 605 are attached.

Field inspection report for Bay State Gas/Commonwealth Gas dated May 23, 1995, attached as Exhibit NSTAR 1-36(A).

Field inspection report for Commonwealth Gas dated January 24, 1996, attached as Exhibit NSTAR 1-36(B).

Field inspection reports for Commonwealth Gas dated June 3 and June 4, 1996, attached as Exhibit NSTAR 1-36(C).

Field inspection report for Commonwealth Gas dated January 9, 1998, attached as Exhibit NSTAR 1-36(D).

Field inspection report for Commonwealth Gas dated August 13, 1999, attached as Exhibit NSTAR 1-36(E).

Field inspection report for Commonwealth Gas dated December 3, 1999, attached as Exhibit NSTAR 1-36(F).

Field inspection report for Commonwealth Gas dated December 13, 1999, attached as Exhibit NSTAR 1-36(G).

Field inspection report for Commonwealth Gas dated March 13, 2000, attached as Exhibit NSTAR 1-36(H).

Field inspection report for Commonwealth Gas dated May 8, 2000, attached as Exhibit NSTAR 1-36(I).

Field inspection report for Commonwealth Gas dated July 13, 2000, attached as Exhibit NSTAR 1-36(J).

Field inspection report for Commonwealth Gas dated October 13, 2000, attached as Exhibit NSTAR 1-36(K).

Field inspection reports for Commonwealth Gas dated February 6, 2002, February 12, 2002, March 27, 2002, April 1, 2002, and May 20, 2002, attached as Exhibit NSTAR 1-36(L).

Please see responses to information requests NSTAR 1-24, 1-35, 1-38, and 1-39.